

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2001

Docket No. R2001-1

RESPONSE OF UNITED STATES POSTAL SERVICE
WITNESS JAMES M. KIEFER TO INTERROGATORY OF
UNITED PARCEL SERVICE
(UPS/USPS-T33-20)

The United States Postal Service hereby files the response of witness James M. Kiefer to the following interrogatory of United Parcel Service: UPS/USPS-T33-20, filed on November 29, 2001.

The interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking



Scott L. Reiter

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December 10, 2001

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS KIEFER TO
INTERROGATORY OF UNITED PARCEL SERVICE**

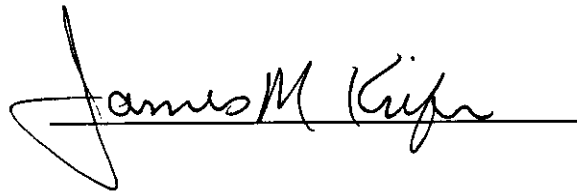
UPS/USPS-T33-20. Provide all available information with respect to how often Parcel Post pieces are delivered by the next business day after entry or arrival at the DDU.

RESPONSE

Witness Kingsley's response to UPS/USPS-T33-7 indicates that there is no quantitative information as to whether parcels are delivered the next business day from the DDU. I am informed that this is true regardless of whether the pieces are entered at the DDU or arrive there from within the postal system.

DECLARATION

I, James M. Kiefer, declare under penalty of perjury that the foregoing answers are true and correct, to the best of my knowledge, information, and belief.

A handwritten signature in black ink, reading "James M. Kiefer", is written over a horizontal line. The signature is stylized, with a large, sweeping initial "J" that loops back under the line.

Dated: 12/10/01

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

A handwritten signature in black ink, appearing to read "Scott L. Reiter", is written over a horizontal line.

Scott L. Reiter

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